

REMARKS

Reconsideration of the above-identified application, as amended, is respectfully requested.

In the Office Action of July 8, 2004, which has been made final, the Examiner maintained the rejected pending Claims 1-18 under 35 U.S.C. §102(e), as being allegedly anticipated by Clendinning (U.S. Patent Publication No. 2002/0107861 A1) (hereinafter "Clendinning").

With respect to the rejection of Claims 1-18 as anticipated by Clendinning, applicants respectfully disagree for the reasons herein. The crux of the Examiner's argument is the Examiner's equivocating a "database" as a "ruleset". Applicants respectfully disagree. A database is defined as a collection of information organized in such a way that a computer program can quickly select desired pieces of data. Respectfully, a database may be thought of as an electronic filing system. Traditional databases are organized by fields, records, and files. A field is a single piece of information; a record is one complete set of fields; and a file is a collection of records. For example, a telephone book is analogous to a file. It contains a list of records, each of which consists of three fields: name, address, and telephone number. An alternative concept in database design is known as Hypertext. In a Hypertext database, any object, whether it be a piece of text, a picture, or a film, can be linked to any other object. Hypertext databases are particularly useful for organizing large amounts of disparate information, but they are not designed for numerical analysis. Moreover, the definition of datum(data) is an item of factual information, e.g., derived from measurement or research.

To the contrary, applicants' respectfully submit that a "Ruleset" as claimed in independent Claims 1, 9 and 15 is defined as comprising "rules" (e.g., a collection of rules). Respectfully, the definition of a rule may be stated in a variety of ways, including: 1. a principle or condition that customarily governs behavior; 2. a prescribed guide for conduct or action; 3. a rule can contain logic and infer new information; and 4. directions that define the way an activity is to be conducted. Simply stated, "Rules" contain logic, and can infer new information while "Data" are facts/information.

The mechanism to merge logic, i.e., rulesets, as claimed in the present invention thus involves much more analysis than just "data" which is being merged in Clendinning and which does not contain logic. Respectfully, based on the aforementioned definitions that a ruleset and database are different entities which have different implementations, expressions, purposes, functions, representation and applications, all of the Examiner's reasons in rejecting the independent Claims 1, 9 and 15 are therefore incorrect, even when given the broad interpretation. To clarify this point, Claims 1, 9 and 15 are being amended to set forth that the merge policy provided to the assimilator for merging of rulesets comprises a set of specifications including syntax and semantics for expressing conflict resolution as partially-ordered priorities and/or mutual-exclusion constraints. Respectfully, an example of a merge policy specification including syntax and semantics is provided in the specification, e.g., on page 20, et seq. which provides an example of a merge rule represented as follows:

...**a(?X,?Y)<-b(?X,?Y....) AND c(?X,?Y....)** with a,b,c representing predicates or facts, ?X,?Y representing variables, and with the right hand side of the rule "a(?X,?Y)" representing the conclusion or consequent and, the left hand side of the rule "b(?X, ?Y)" representing the antecedent...

The specification and implementation of a merge policy including syntax and semantics for expressing conflict resolution as partially-ordered priorities and/or mutual-exclusion constraints is neither taught nor suggested by Clendinning. Respectfully, no new matter is being entered by this amendment to as full support is provided in the present specification, e.g., at page 14, lines 15-19.

In view of this, regarding some of the specific reasons stated by the Examiner in his rejecting the claims, e.g., Claim 6, the Examiner alleges that Clendinning anticipates a logic mechanism including mutual exclusion restraints (paragraph [0046] of Clendinning). The Examiner specifically asserts that what is meant by mutual exclusion is "independence" and that an integer is an example of independent constraint. Respectfully, this is a very simplistic an interpretation and reflects a lack of consideration that "data" are different than "rules" which contain logic. Thus, applicants submit that representation of mutual exclusion by an integer with logical rules is impossible. For example: the mutual exclusion expression: $a(?X1, ?Y2)$ and $b(?X2, ?Y2)$ cannot exist simultaneously unless $?X1 = ?X2$ AND $?Y1 \neq ?Y2$ where $?X1, ?X2, ?Y1$ and $?Y2$ are variables.

The ruleset merging algorithm of the present invention uses the above mutual exclusion expression in resolving conflict. Thus, respectfully, applicants' do not understand how Clendinning's integer approach can be applied to such a system in resolving conflict since $?X1, ?X2, ?Y1, ?Y2$ are not static values (but "data" are). Thus, the Examiner's assertion that an integer is an independent entity is incorrect, and it is respectfully submitted that the rejection of Claim 6 is erroneous.

As a further example, with respect to the Examiner's rejection of Claim 17, the Examiner alleges that Clendinnings' teaching of transforming sets of data into common format data anticipates the step of translating rulesets into a common representation. Applicants' respectfully disagree. The data transformation in Clendinning involves canonical representation only. However, in the present invention, the transformation of rulesets into a common representation involves semantic and canonical representation. In other words, the translated ruleset (into the common representation) must be LOGICALLY equivalent to the original ruleset. Respectfully, the Examiner has failed to consider such point which constitutes and forms the basis of the ruleset assimilation service according to the present invention.

In sum, Clendinning does not assimilate rulesets to produce a new merged ruleset comprising logic required for resolving potential conflicts among rules in accordance with a merge policy comprising a set of specifications including syntax and semantics for expressing conflict resolution as partially-ordered priorities and/or mutual-exclusion constraints. That is, Clendinning does not merge business logic rules (e.g., policy implemented as a series of if-then-else patterns) as the present invention is directed and set forth in the independent Claims. Therefore, it is respectfully requested that the Examiner withdraw the rejections of amended Claims 1, 9 and 15 as being anticipated by Clendinning, and further, withdraw the rejections of all claims dependent upon Claims 1, 9 and 15.

Applicants further take this opportunity to correct a minor informality (i.e., presence of a period) in Claim 15.

In view of the foregoing remarks herein, it is respectfully submitted that this application is in condition for allowance. Accordingly, it is respectfully requested that this

application be allowed and a Notice of Allowance be issued. If the Examiner believes that a telephone conference with the Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned, Applicants' attorney, at the following telephone number: (516) 742-4343.

Respectfully submitted,



Steven Fischman
Registration No. 34,594

Scully, Scott, Murphy & Presser
400 Garden City Plaza
Garden City, New York 11530
(516) 7472-4343

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